REMARKS

In response to the Office Action dated June 22, 2007, claims 1, 3, 5, 14, 19, 20, and 24 have been amended and claims 2, 4, 17, 18, 21, and 28 have been canceled. Therefore, claims 1, 3, 5-16, 19, 20, and 22-29 are now in the case. In light of the amendments and arguments set forth herein, reexamination and reconsideration of the application are requested.

Section 112, Second Paragraph Rejections

The Office Action rejected claim 18 under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter that the Applicants regard as the invention. In particular, the Office Action stated that "[C]laim 18 recites 'omitting an output non-linearity, which was used during the training . . . to generate a modified feature vector output', however this is unclear."

The Office Action goes on to say that the "Examiner acknowledges the description on the specification, however this does not clarify 'omitting an output non-linearity'. It is unclear as to what step or piece of information, used during training, is omitted. Therefore, the examiner interprets claim 18 as the anchor model producing a likelihood score during the use phase. The likelihood score then is normalized to produce a modified feature vector output. This interpretation is used throughout the remainder of this office action."

In response, the Applicants have canceled claim 18 and incorporated the subject matter of claim 18 into amended independent claim 14. These amendments make it clear that the classifiers were trained on a neural network that included non-linear terms, and during the use phase an output of the anchor models is obtained before final non-linear terms are applied to the anchor models. This generates a modified feature vector output. As explained below in regards to claim 14, this modified feature vector output is normalized to generate a normalized anchor model output.

Based on these amendments and the arguments above and below, the Applicants respectfully requests reexamination, reconsideration and withdrawal of the rejection of claim 18 under 35 U.S.C. § 112, second paragraph.

Section 103(a) Rejections

The Office Action rejected claims 1-4, 6-10, 12-14, 17-19, and 20-28 under 35 U.S.C. § 103(a) as being unpatentable over a paper by Sturim et al. entitled "Speaker Indexing in Large Audio Databases Using Anchor Models" in view of a paper by Rudasi et al. entitled "Text-Independent Talker Identification With Neural Networks". The Office Action contended that Sturim et al. teach all the elements of the Applicants' claimed invention, except that Sturim et al. do not "disclose wherein the plurality of anchor models comprise a discriminatively trained classifier that is previously trained using a training technique." However, the Office Action stated that Rudasi et al. teach this claimed feature. Therefore, the Office Action stated that "it would have been obvious to one of ordinary skill in the art at the time of the invention to use a discriminatively-trained classifier as an anchor model in Sturim."

In response, the Applicants respectfully traverse these rejections. In general, the Applicants submit that the combination of Sturim et al. and Rudasi et al. is lacking several elements of the Applicants' claimed invention. More specifically, neither Sturim et al. nor Rudasi et al. disclose, either explicitly or implicitly, the material claimed features of:

1. (recited in amended independent claim 1): "using discriminatively-trained classifiers that are time-delay neural network (TDNN) classifiers to produce a plurality of anchor model outputs";

2. (recited in amended independent claim 14): "obtaining a preliminary output of the plurality of anchor models from the convolutional neural network before final non-linear terms are applied to generate a modified feature vector output";

3. (recited in amended independent claim 20): "using discriminatively-trained classifiers that are time-delay neural network (TDNN) classifiers to produce a plurality of anchor model outputs";

4. (recited in amended independent claim 24): "using discriminatively-trained classifiers that are time-delay neural network (TDNN) classifiers to produce a plurality of anchor model outputs"; and
"obtaining the plurality of anchor model outputs from the convolutional neural network before final non-linear terms are applied to generate a modified plurality of anchor model outputs".

Further, the combination of Sturim et al. and Rudasi et al. fails to appreciate the advantages of these claimed features. In addition, there is no technical suggestion or motivation disclosed in either Sturim et al. or Rudasi et al. to define these claimed features. Thus, the Applicants submit that the combination of Sturim et al. and Rudasi et al. cannot make obvious the Applicants' claimed features listed above.

To make a prima facie showing of obviousness, all of the claimed features of an Applicant's invention must be considered, especially when they are missing from the prior art. If a claimed feature is not disclosed in the prior art and has advantages not appreciated by the prior art, then no prima facie showing of obviousness has been made. The Federal Circuit Court has held that it was an error not to distinguish claims over a combination of prior art references where a material limitation in the claimed system and its purpose was not taught therein. *In re Fine,* 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988). Moreover, as stated in the MPEP, if a prior art reference does not disclose, suggest or provide any motivation for at least one claimed feature of an Applicant's invention, then a prima facie case of obviousness has not been established (MPEP § 2142).

Amended Independent Claims 1 and 20

Amended independent claim 1 recites a method for processing audio data. The method includes using discriminatively-trained classifiers that are time-delay neural network (TDNN) classifiers to produce a plurality of anchor model outputs, and applying the plurality of anchor models to the audio data. The method also includes mapping the output of the plurality of anchor models into frame tags, and producing the frame tags.

Amended independent claim 20 recites a method for processing audio data containing a plurality of speakers. The method includes using discriminatively-trained classifiers that are time-delay neural network (TDNN) classifiers to produce a plurality of anchor model outputs, and applying the plurality of anchor models to the audio data. The method also includes mapping an output of the anchor models into frame tags, and constructing a list of start and stop times for each of the plurality of speakers based on the frame tags. The discriminatively-trained classifiers were previously trained using a training set containing a set of training speakers, and wherein the plurality of speakers is not in the set of training speakers.

The Applicants' specification states that "a discriminatively-trained classifier is used to produce anchor model outputs (box 810). The discriminatively-trained classifier can be a convolutional neural network classifier or a time-delay neural network (TDNN) classifier" (specification, page 21, lines 4-7).

In contrast, Sturim et al. merely teach using a Gaussian Mixture Model (GMM) as the anchor model. In particular, Sturim et al. say that their "study uses the GMM-UBM as the representation model for forming the anchors" (section 2, first paragraph, lines 7-8). As stated in the Applicants' specification, "[O]ne problem with using a GMM as an anchor model, however, it that a GMM is not inherently discriminative" (specification, page 2, lines 28-29).

The Office Action stated that Rudasi et al. teach using TDNN classifiers to produce anchor model outputs. However, although Rudasi et al. do mention TDNN classifiers, they do not teach using them to produce anchor model outputs. Moreover,

Rudasi et al. actually teach away from using TDNN classifiers. In particular, Rudasi et al. state that "[B]y increasing the time window, or by adding short term memory to the network, such as with a recurrent or time-delay neural network, the ability to utilize dynamic information is added. This causes some performance improvement . . . but at the expense of significantly increased training time. In the present study, **only memoryless feed-forward networks were used**. Rudasi et al. go on to say that the type of memoryless feed-forward networks used were binary-pair neural networks. In other words, Rudasi et al. specifically state that TDNN neural networks **should not be used**, because they significantly increase training time.

In addition, to teaching away from using TDNN classifiers to produce anchor model outputs, there is also no motivation to combine the system of Sturim et al. with the system of Rudasi et al. First, Rudasi et al. explicitly say that the TDNN neural network should not be used, and then uses a different type of neural network. Second, Sturim et al. use a cascading system because they believe that an anchor model by itself does not work well. Specifically, Sturim et al. state that the "GMM-UBM has superior detection performance while the anchor system provides the computational efficiency that is essential when searching large archives. In an effort to gain a better tradeoff between computational performance and accuracy, the anchor and GMM-UBM speaker detection systems were combined in a cascade" (section 4.2, first paragraph, lines 2-8).

Third, in the cascade system of Sturim et al., the "anchor model is employed in the first stage to reduce the amount of computational loading for the GMM-UBM speaker detection system" (section 4.2, first paragraph, lines 10-13). In other words, Sturim et al. use a cascade system because they believe that the anchor system by itself is to computationally intensive. Moreover, Rudasi et al. say that TDNN neural networks are computationally intensive and significantly increase training time. Thus, one of ordinary skill in the art would have no motivation to take the TDNN neural network discussed by Rudasi et al. (which they say significantly increases training time) and combine it with the GMM-based anchor model of Sturim et al. (which they say is

computationally intensive). In fact, there would be disincentive to do so, because according to Sturim et al. and Rudasi et al. the resulting system would be highly computationally intensive.

The combination of Sturim et al. and Rudasi et al. also fails to appreciate or recognize the advantages of "using discriminatively-trained classifiers that are time-delay neural network (TDNN) classifiers to produce a plurality of anchor model outputs". More specifically, "the TDNN classifier 1415 is a specific type of convolutional neural network (CNN) classifier. . . In general, a CNN classifier has two main advantages. First, the CNN classifier can handle arbitrary sized inputs. This can be useful in speaker classification, since in general the speaker inputs vary in duration from one training set to the next, and vary similarly in use phase. Second, the use of convolutional kernels controls the capacity of the network to prevent overfitting, which is known in the art to improve classification performance" (specification, page 28, lines 15-25). Neither Sturim et al. nor Rudasi et al. discuss or appreciate these advantages of this feature recited in the Applicants' claims 1 and 20.

The Applicants, therefore, submit that obviousness cannot be established since the combination of Sturim et al. and Rudasi et al. fails to teach, disclose, suggest or provide any motivation for the feature recited in amended claims 1 and 20 of "using discriminatively-trained classifiers that are time-delay neural network (TDNN) classifiers to produce a plurality of anchor model outputs". In addition to explicitly lacking this feature, the combination of Sturim et al. and Rudasi et al. fails to implicitly disclose, suggest, or provide motivation for this feature. Further, the combination also fails to appreciate advantages of this claimed feature.

Therefore, as set forth in *In re Fine* and MPEP § 2142, the combination of Sturim et al. and Rudasi et al. cannot render amended independent claims 1 and 20 obvious because both Sturim et al. and Rudasi et al. are missing at least the material feature recited in claims 1 and 20, as discussed above. Consequently, because a prima facie case of obviousness cannot be established due to the lack of "some teaching,

suggestion, or incentive supporting the combination", the rejections must be withdrawn. ACS Hospital Systems, Inc. v. Montefiore Hospital, 732 F.2d 1572, 1577, 221 USPQ 929, 933 (Fed. Cir. 1984); MPEP 2143.01.

Accordingly, the Applicants respectfully submit that amended independent claims 1 and 20 are patentable under 35 U.S.C. § 103(a) over Sturim et al. in view of Rudasi et al. based on the amendments to claims 1 and 20 and the legal and technical arguments set forth above and below. Moreover, claims 2-4, 6-10, 12, and 13 depend from amended independent claim 1, and claims 21-23 depend from amended independent claim 20, and are also nonobvious over Sturim et al. in view of Rudasi et al. (MPEP § 2143.03). The Applicants, therefore, respectfully request reexamination, reconsideration and withdrawal of the rejection of claims 1-4, 6-10, 12, 13, and 20-23 under 35 U.S.C. § 103(a) as being unpatentable over Sturim et al. in view of Rudasi et al.

Amended Independent Claim 14

Amended independent claim 14 recites a computer-implemented process for processing audio data. The process includes applying a plurality of anchor models to the audio data, the plurality of anchor models comprising discriminatively-trained classifiers of a convolutional neural network that were previously trained using a training technique that included non-linear terms, and obtaining a preliminary output of the plurality of anchor models from the convolutional neural network before final non-linear terms are applied to generate a modified feature vector output. The process also includes normalizing the modified feature vector output to generate normalized anchor model output, mapping the normalized anchor model output into frame tags, and producing the frame tags.

The Applicants' specification states that the "normalization module 400 initially accepts the convolutional neural network outputs 600. These outputs 600 are obtained prior to an application of the final nonlinearity process. In other words, during training, the convolutional neural network uses nonlinearities, but the normalization module 400 obtains the output 600 before the final nonlinearities are applied" (specification, page 19, lines 13-17). For example, in the working example presented in the specification,

the "TDNN classifier 1415 has two layers with each layer including a one-dimensional convolution followed by a nonlinearity" (specification, page 28, lines 29-30). This includes "omitting the nonlinearity contained in the second layer of the TDNN classifier 1415 (in this case the TDNN classifier was trained using the cross-entropy technique). In other words, the numbers before the nonlinearity are used (there were 76 of these numbers)" (specification, page 30, lines 25-29).

In contrast, neither Sturim et al. nor Rudasi et al. disclose obtaining a preliminary output of the plurality of anchor models from the convolutional neural network before final non-linear terms are applied to generate a modified feature vector output. In fact, neither paper even discuss this claimed feature recited in amended claim 14. Moreover, the combination of Sturim et al. and Rudasi et al. also fails to appreciate or recognize the advantages of this feature. In particular, this feature is part of a normalization process, which "is used to remove spurious discrepancies caused by scaling by mapping data to a unit sphere" (specification, page 24, lines 7-8). Neither Sturim et al. nor Rudasi et al. discuss or appreciate these advantages of this feature recited in the Applicants' amended claim 14.

The Applicants, therefore, submit that obviousness cannot be established since the combination of Sturim et al. and Rudasi et al. fails to teach, disclose, suggest or provide any motivation for the feature recited in amended claim 14 of ""obtaining a preliminary output of the plurality of anchor models from the convolutional neural network before final non-linear terms are applied to generate a modified feature vector output". In addition to explicitly lacking this feature, the combination of Sturim et al. and Rudasi et al. fails to implicitly disclose, suggest, or provide motivation for this feature. Further, the combination also fails to appreciate advantages of this claimed feature.

Therefore, as set forth in *In re Fine* and MPEP § 2142, the combination of Sturim et al. and Rudasi et al. cannot render amended independent claim 14 obvious because both Sturim et al. and Rudasi et al. are missing at least the material feature recited in claim 14, as discussed above. Consequently, because a prima facie case of

obviousness cannot be established due to the lack of "some teaching, suggestion, or incentive supporting the combination", the rejections must be withdrawn. ACS Hospital Systems, Inc. v. Montefiore Hospital, 732 F.2d 1572, 1577, 221 USPQ 929, 933 (Fed. Cir. 1984); MPEP 2143.01.

Accordingly, the Applicants respectfully submit that amended independent claim 14 is patentable under 35 U.S.C. § 103(a) over Sturim et al. in view of Rudasi et al. based on the amendments to claim 14 and the legal and technical arguments set forth above and below. Moreover, claims 17-19 depend from amended independent claim 14, and are also nonobvious over Sturim et al. in view of Rudasi et al. (MPEP § 2143.03). The Applicants, therefore, respectfully request reexamination, reconsideration and withdrawal of the rejection of claims 14 and 17-19 under 35 U.S.C. § 103(a) as being unpatentable over Sturim et al. in view of Rudasi et al.

Amended Independent Claim 24

Amended independent claim 24 recites a computer-readable medium having computer-executable instructions for processing audio data. The instructions include training discriminatively-trained classifier that is a time-delay neural network (TDNN) classifier in a discriminative manner on a convolutional neural network using a training technique that includes non-linear terms such that the training occurs during a training phase to generate parameters that can be used at a later time by the TDNN classifier, and using discriminatively-trained classifiers that are time-delay neural network (TDNN) classifiers to produce a plurality of anchor model outputs. The instructions further include obtaining the plurality of anchor model outputs from the convolutional neural network before final non-linear terms are applied to generate a modified plurality of anchor model outputs, normalizing the modified plurality of anchor model output to generate normalized anchor model outputs, and clustering the normalized anchor model outputs into frame tags of speakers that are contained in the audio data.

As stated above, neither Sturim et al. nor Rudasi et al. disclose the two features recited in amended claim 24 of ""using discriminatively-trained classifiers that are time-

delay neural network (TDNN) classifiers to produce a plurality of anchor model outputs", and "obtaining the plurality of anchor model outputs from the convolutional neural network before final non-linear terms are applied to generate a modified plurality of anchor model outputs". Moreover, neither Sturim et al. nor Rudasi et al. discuss or appreciate the advantages of these two features recited in the Applicant's claim 24.

Therefore, as set forth in *In re Fine* and MPEP § 2142, the combination of Sturim et al. and Rudasi et al. cannot render amended independent claim 24 obvious because both Sturim et al. and Rudasi et al. are missing at least two material features recited in claim 24, as discussed above. Consequently, because a prima facie case of obviousness cannot be established due to the lack of "some teaching, suggestion, or incentive supporting the combination", the rejection must be withdrawn. ACS Hospital Systems, Inc. v. Montefiore Hospital, 732 F.2d 1572, 1577, 221 USPQ 929, 933 (Fed. Cir. 1984); MPEP 2143.01.

Accordingly, the Applicant respectfully submits that amended independent claim 24 is patentable under 35 U.S.C. § 103(a) over Sturim et al. in view of Rudasi et al. based on the amendments to claim 24 and the legal and technical arguments set forth above and below. Moreover, claims 25-28 depend from amended independent claim 24 and are also nonobvious over Sturim et al. in view of Rudasi et al. (MPEP § 2143.03). The Applicants, therefore, respectfully request reexamination, reconsideration and withdrawal of the rejection of claims 24-28 under 35 U.S.C. § 103(a) as being unpatentable over Sturim et al. in view of Rudasi et al.

The Office Action rejected claims 5, 15, and 16 under 35 U.S.C. § 103(a) as being unpatentable over Sturim et al. in view of Rudasi et al. and further in view of a paper by Lavagetto entitled "Time-Delay Neural Network for Estimating Lip Movements form Speech Analysis". The Office Action contended that the combination of Sturim et al., Rudasi et al., and Lavagetto teach all the elements recited in these claims.

In response, the Applicants respectfully traverse these rejections. As mentioned above, the Applicants submit that the combination of Sturim et al., Rudasi et al., and Lavagetto is lacking several elements of the Applicants' claimed invention. More specifically, neither Sturim et al., Rudasi et al., nor Lavagetto disclose, either explicitly or implicitly, the material claimed features of:

1. (recited in amended independent claim 1): "using discriminatively-trained classifiers that are time-delay neural network (TDNN) classifiers to produce a plurality of anchor model outputs";

2. (recited in amended independent claim 14): "obtaining a preliminary output of the plurality of anchor models from the convolutional neural network before final non-linear terms are applied to generate a modified feature vector output";

Further, the combination fails to appreciate the advantages of these claimed features. In addition, there is no technical suggestion or motivation disclosed in either Sturim et al., Rudasi et al., or Lavagetto to define these claimed features. Thus, the Applicants submit that the combination of Sturim et al., Rudasi et al., and Lavagetto cannot make obvious the Applicants' claimed features listed above.

Regarding the features recited in claims 1 and 14, it was argued above that neither Sturim et al. nor Rudasi et al. disclose this feature.

Lavagetto adds nothing to the cited combination that would render obvious Applicants' claims 1 and 14. In particular, Lavagetto merely discloses using a time-delay neural network to analyze speech to estimate lip movements. Nowhere, however, does Lavagetto teach the Applicant's claimed feature recited in claim 1 of "using discriminatively-trained classifiers that are time-delay neural network (TDNN) classifiers to produce a plurality of anchor model outputs" or the feature recited in claim 14 of "obtaining a preliminary output of the plurality of anchor models from the convolutional neural network before final non-linear terms are applied to generate a modified feature

vector output". In addition, Lavagetto fails to appreciate or recognize the advantages of these claimed features.

The Applicants, therefore, submit that obviousness cannot be established since the combination of Sturim et al., Rudasi et al., and Lavagetto fails to teach, disclose, suggest or provide any motivation for the Applicants' claimed features recited in claims 1 and 14. In addition to explicitly lacking these features , Sturim et al., Rudasi et al., and Lavagetto fail to implicitly disclose, suggest, or provide motivation for these features. Further, the combination also fails to appreciate the advantages of these claimed features.

Therefore, as set forth in *In re Fine* and MPEP § 2142, the combination of Sturim et al., Rudasi et al., and Lavagetto cannot render the Applicants' claims 1 and 14 obvious. Consequently, because a prima facie case of obviousness cannot be established due to the lack of "some teaching, suggestion, or incentive supporting the combination", the rejection must be withdrawn. ACS Hospital Systems, Inc. v. Montefiore Hospital, 732 F.2d 1572, 1577, 221 USPQ 929, 933 (Fed. Cir. 1984); MPEP 2143.01.

Accordingly, the Applicants respectfully submit that amended independent claims 1 and 14 are patentable under 35 U.S.C. § 103(a) over Sturim et al. in view of Rudasi et al. and in view of Lavagetto based on the amendments to claims 1 and 14 and the legal and technical arguments set forth above and below. Moreover, claim 5 depend from amended independent claim 1, and claims 15 and 16 depend from amended independent claim 14, and are also nonobvious over the cited art (MPEP § 2143.03). The Applicants, therefore, respectfully request reexamination, reconsideration and withdrawal of the rejection of claims 5, 15, and 16.

The Office Action rejected claims 11, and 29 under 35 U.S.C. § 103(a) as being unpatentable over Sturim et al. in view of Rudasi et al. and further in view of Liu (U.S. Patent No. 6,615,170). The Office Action contended that the combination of Sturim et al., Rudasi et al., and Liu teach all the elements recited in these claims.

In response, the Applicants respectfully traverse these rejections. As mentioned above, the Applicants submit that the combination of Sturim et al., Rudasi et al., and Liu is lacking several elements of the Applicants' claimed invention. More specifically, neither Sturim et al., Rudasi et al., nor Liu disclose, either explicitly or implicitly, the material claimed features of:

1. (recited in amended independent claim 1): "using discriminatively-trained classifiers that are time-delay neural network (TDNN) classifiers to produce a plurality of anchor model outputs";

2. (recited in amended independent claim 24): "using discriminatively-trained classifiers that are time-delay neural network (TDNN) classifiers to produce a plurality of anchor model outputs"; and
"obtaining the plurality of anchor model outputs from the convolutional neural network before final non-linear terms are applied to generate a modified plurality of anchor model outputs".

Further, the combination fails to appreciate the advantages of these claimed features. In addition, there is no technical suggestion or motivation disclosed in either Sturim et al., Rudasi et al., or Liu to define these claimed features. Thus, the Applicants submit that the combination of Sturim et al., Rudasi et al., and Liu cannot make obvious the Applicants' claimed features listed above.

Regarding the features recited in claims 1 and 24, it was argued above that neither Sturim et al. nor Rudasi et al. disclose this feature.

Liu adds nothing to the cited combination that would render obvious Applicants' claims 1 and 24. Nowhere does Liu teach the Applicant's claimed feature recited in claim 1 and recited in claim 24. In addition, Liu fails to appreciate or recognize the advantages of these claimed features.

The Applicants, therefore, submit that obviousness cannot be established since the combination of Sturim et al., Rudasi et al., and Liu fails to teach, disclose, suggest or provide any motivation for the Applicants' claimed features recited in claims 1 and 24. In addition to explicitly lacking these features , Sturim et al., Rudasi et al., and Liu fail to implicitly disclose, suggest, or provide motivation for these features. Further, the combination also fails to appreciate the advantages of these claimed features.

Therefore, as set forth in *In re Fine* and MPEP § 2142, the combination of Sturim et al., Rudasi et al., and Liu cannot render the Applicants' claims 1 and 24 obvious. Consequently, because a prima facie case of obviousness cannot be established due to the lack of "some teaching, suggestion, or incentive supporting the combination", the rejection must be withdrawn. ACS Hospital Systems, Inc. v. Montefiore Hospital, 732 F.2d 1572, 1577, 221 USPQ 929, 933 (Fed. Cir. 1984); MPEP 2143.01.

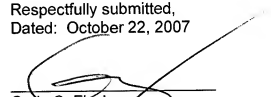
Accordingly, the Applicants respectfully submit that amended independent claims 1 and 24 are patentable under 35 U.S.C. § 103(a) over Sturim et al. in view of Rudasi et al. and in view of Liu based on the amendments to claims 1 and 24 and the legal and technical arguments set forth above and below. Moreover, claim 11 depends from amended independent claim 1, and claim 29 depends from amended independent claim 24, and are also nonobvious over the cited art (MPEP § 2143.03). The Applicants, therefore, respectfully request reexamination, reconsideration and withdrawal of the rejection of claims 11 and 29.

Conclusion

In view of the amendments to claims 1, 3, 5, 14, 19, 20, and 24, and the arguments set forth above, the Applicants submit that claims 1, 3, 5-16, 19, 20, and 22-29 are in condition for immediate allowance. The Examiner, therefore, is respectfully requested to withdraw the outstanding rejections of the claims and to pass all of the pending claims of this application to issue.

In an effort to expedite and further the prosecution of the subject application, the Applicants kindly invite the Examiner to telephone the Applicants' attorney at (805) 278-8855 if the Examiner has any comments, questions or concerns, wishes to discuss any aspect of the prosecution of this application, or desires any degree of clarification of this response.

Respectfully submitted,
Dated: October 22, 2007



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